

APS International Plaza • 7800 Glenroy Road
Minneapolis, Minnesota 55439-3122
PHONE: (952) 831-7776
FAX: (952) 831-8150
TOLL FREE: (800) 328-7171 ext. 341

APS International, Ltd.

February 24, 2022

www.CivilActionGroup.com

AMickow@CivilActionGroup.com

Kate Fogarty
Clerk of Court
U.S. District Court, District of Minnesota
Warren E. Burger Federal Building and U.S. Courthouse
316 North Robert Street
St. Paul, MN 55101

Re: James Keenan, et al. v. Holy See
Case No.: 19-cv-1272 (ECT/ECW)

Dear Ms. Fogarty:

Enclosed please find documents and instructions relating to another attempt at service of process on the Holy See (State of Vatican City; The Vatican) in the case *Keenan, et al. v. Holy See*, Case. No. 0:19-cv-01272-ECT-ECW. The enclosed documents must be dispatched by the Clerk of Court pursuant to the U.S. Foreign Sovereign Immunities Act, 28 USC § 1608(a)(4).

Pursuant to this section, service shall be made “by sending two copies of the summons and complaint and a notice of suit, together with a translation of each into the official language of the foreign state, by any form of mail requiring a signed receipt, to be addressed and dispatched by the clerk of the court to the Secretary of State in Washington, District of Columbia, to the attention of the Director of Special Consular Services—and the Secretary shall transmit one copy of the papers through diplomatic channels to the foreign state and shall send to the clerk of the court a certified copy of the diplomatic note indicating when the papers were transmitted.” 28 USC § 1608(a)(4).

Enclosed in the manila envelope is a letter from the U.S. District Court, District of Minnesota addressed to the U.S. Department of State; a Declaration of Mailing; a check in the amount of \$2,275.00 to cover the State Department fee; and a Federal Express air waybill. Also enclosed are two sets of the following documents: Amended Notice of Suit with attached copy of the Foreign Sovereign Immunities Act, Amended Summons in a Civil Action, Complaint, and Latin Translations of each of these documents.

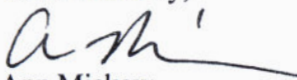
In order to effectuate service, please complete the following:

1. Have the Clerk of Court sign/seal the enclosed letter from the U.S. District Court to the U.S. Department of State;
2. Have the Clerk of Court date and fill in their name on the closed FedEx air waybill;
3. Place the following documents into the FedEx package and mail: the Letter from the U.S. District Court; the check for \$2,275.00; and the two sets of documents;
4. Have the Clerk of Court Complete the enclosed Declaration of Mailing or one alternately acceptable to the Court;
5. Once completed, make a copy of the completed Declaration of Mailing and FedEx air waybill; and
6. Please return copies of the Declaration of Mailing and FedEx air waybill to our office via e-mail.

I have also enclosed a set of the documents for your files.

Thank you for your cooperation. Please feel free to contact me if you have any questions or concerns regarding this matter.

Yours sincerely,



Ann Mickow
International Division
APS International, Ltd.
amickow@civilactiongroup.com